

Appl. No. 10/039,942
Amdt. dated September 26, 2005
Reply to Office action of July 25, 2005

Docket No. 47406-012500

REMARKS

Applicants wish to thank Examiner's Supervisor, Kamand Cuneo, for helpful discussions with Applicants' representative, Pablo Tapia. Based on informally submitted arguments, Examiner Cuneo suggested that these arguments be submitted formally. As discussed below, these arguments highlight the differences between the cited prior art and the claims of the present Application.

Claims 1-25 are pending in the application.

Applicants submit that the claims are in condition for allowance.

Claim Objections

In the Office Action, the Examiner states that "Applicant must withdraw new claims 12-18 drawn to a method for reason discussed in Office Action filed on 3/10/2005." During a telephone call with Examiner's supervisor, Examiner Cuneo, it was clarified that said reasons referred to a "restriction by submission" based on the as-filed application. Further, in a later telephone communication with Examiner Cuneo on 9/26/2005, it was further clarified that the method claims would not have to be withdrawn if they contained at least the same structural limitations as the product claims (e.g. claim 1). Method claim 12 includes "a copper clad laminate having a dielectric layer laminated between a first and a second copper layer..." As such, Applicants submit that method claim 12 and the product claims recite a common structural limitation. Therefore, Applicants request that method claim 12, and its dependant claims 13-18, be examined together with the rest of the pending claims.

The Office Action further states that "the abstract of the disclosure is objected to because the sentence 'A method of filling holes...' is not succinct. The subject of this application is an assembly (product) not a method of making assembly." Consistent with Applicants' position regarding method claims 12-18, Applicants believe that no amendment is necessary.

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Claim Rejections - 35 U.S.C. § 103

On page 2 of the Office Action, Claims 1-11 are rejected under 35 U.S.C. § 103(a) as being unpatentable by U.S. Patent 5,191,709 to Kawakami et al. ("Kawakami") in view of U.S. Patent 6,282,782 to Biunno et al. ("Biunno").

The Office Action expressly admits that the Kawakami reference does not teach an etched hole-fill stand-off. (Page 5, Lines 19-20). Rather, the Office Action relies on the combination of Kawakami with Biunno to infer the teaching of an etched hole-fill stand-off as in the present application.

The Office Action characterizes the fixture 318 in Biunno as teaching the stand-off (See page 5, third paragraph), having a etched layer 320, and a non-etched layer 344. In Biunno, the numeral 320 refers to a template 320 with through holes. Numeral 344 in Biunno refers to a support member 344, effectively a tooling plate.

Examiner asserts that it would have been obvious to one of ordinary skill in the art, at the time the invention was made for Kawakami to include in his invention the etched-hole fill stand-off of Biunno. Applicants respectfully disagree for the reasons set forth below.

1. First, there is no motivation to include a **second** tooling plate (the support member 344 of Biunno) on top of the tooling plate of Kawakami (See Column 3, Line 15 reference to "stand 9"), because the function of Kawakami would not change. Stacking one or more tooling plates in the system taught in Kawakami would no change the functionality of Kawakami because the stacked tooling plates would function the same as one single plate. Furthermore, the air permeable layer 324 does not add anything that would bring the combined system of Kawakami in view of Biunno closer to the assembly of the present Application.

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Thus, Applicants submit that adding Biunno's template 320, air permeable layer 324, and support member 344 as a standoff replacement of the Kawakami stand-off, leaves Kawakami with essentially the same function.

Accordingly, it would not be obvious to one of ordinary skill in art to use the template 320 and the support member 344 taught in Biunno as the stand-off (as in the present Application) in combination with Kawakami because there is no motivation to combine them as suggested in the Office Action.

2. Second, when combined, Kawakami and Biunno would not provide the assembly as disclosed in the present application. A laminate by definition is **bonded**. The etched-hole fill stand-off in the present system comprises a copper clad laminate. Biunno does not teach that the template 320, the air permeable layer 324, and the support member 344 taught in Biunno (and cited by the Examiner as the stand-off) are bonded together.

Accordingly, Applicants submit that Kawakami in view of Biunno do not teach the etched hole-fill stand-off as taught in claims 1, 9, and 19 and respectfully request that rejections to claims 1, 9, and 19 be withdrawn and the claims be allowed. Claims 2-8, 11, 20-25 depend on claims 1, 9, and 19 respectively. Therefore, Applicants request that the rejections to claims 2-8, 11, 20-25 also be withdrawn.

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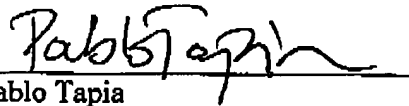
Conclusion

Applicants have complied with all requirements made in the above referenced communication. Accordingly, applicants respectfully request that a timely Notice of Allowance be issued in this case. Should matters remain, which the Examiner believes could be resolved in a telephone interview, the Examiner is requested to telephone the Applicants' undersigned agent.

The Commissioner is authorized during the prosecution of this application to charge fees that may be required or credit any overpayment to Deposit Account No. 50-2638. Please ensure that our Attorney Docket No. 47406-012500 with any credit or charge to our Deposit Account.

Respectfully submitted,

Date: September 26, 2005


Pablo Tapia
Reg. No. 52,275

Customer Number 33717
GREENBERG TRAURIG, LLP
2450 Colorado Avenue, Suite 400E
Santa Monica, CA 90404
Phone: (310) 586-6512
Fax: (310) 586-7800
E-mail: tapiap@gtlaw.com

LA-FS1361712v04